

ATTORNEY NO. 46715

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

JAINTILAL MANNA,

PLAINTIFF,

VS.

NO. 2021L010348

RONALD E. KNOWLES, individually and as agent of FOODLINER, INC, FOODLINER, INC. individually, RONALD E. KNOWLES individually and as agent of MCCOY GROUP, INC., MCCOY GROUP, INC., individually,

DEFENDANTS.

COMPLAINT AT LAW

NOW COME the Plaintiff, JAINTILAL MANNA, by and through his attorneys, the LAW OFFICE OF DANIEL E GOODMAN, L.L.C., who complains of the Defendants, RONALD E. KNOWLES, individually and as agent of FOODLINER, INC, FOODLINER, INC. individually, RONALD E. KNOWLES individually and as agent of MCCOY GROUP, INC., MCCOY GROUP, INC., individually, as follows:

**COUNT 1- NEGLIGENCE v. RONALD E. KNOWLES, individually and as agent of
FOODLINER, INC and FOODLINER, INC. individually**

1) On February 17, 2020, Interstate 94 was a public highway running in an easterly and westerly direction at or near Mile Post 21.25, in the Township of Vernon, County of Lake and State of Illinois.

2) At the time and place aforesaid the Plaintiff, JAINTILAL MANNA, owned and/or operated a vehicle in an westerly direction on Interstate 94 at or near Mile Post 21.25, in the Township of Vernon, County of Lake and State of Illinois.

3) At the time and place aforesaid, the Defendant, RONALD E. KNOWLES, operated a motor vehicle in a westerly direction on Interstate 94 at or near Mile Post 21.25, in the City, County and State aforesaid, and that vehicle was owned, managed, maintained, supervised, and controlled by the Defendant, FOODLINER, INC.

4) At all relevant times herein, the Defendant, RONALD E. KNOWLES, operated said vehicle with the permission of the Defendant, FOODLINER, INC.

5) At all relevant times herein, the Defendant, RONALD E. KNOWLES, was an agent and or employee of the Defendant, FOODLINER, INC., and was driving said vehicle within the scope of his agency, employment, and or servitude.

6) At all times mentioned herein, the Defendant, FOODLINER, INC. individually and by and through its duly authorized agent, RONALD E. KNOWLES and RONALD E. KNOWLES, individually had the duty in the maintenance and operation of said vehicle to exercise ordinary care and caution to avoid injury to persons lawfully upon the thoroughfare, including the Plaintiffs.

7) At the time and place aforesaid, the Defendant, FOODLINER, INC. individually and by and through its duly authorized agent, RONALD E. KNOWLES and RONALD E. KNOWLES, individually, breached their aforementioned duty in one or more of the following ways:

- a) Carelessly and negligently operated, managed, maintained and controlled said vehicle;

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- b) Carelessly and negligently operated said motor vehicle at rate of speed that was greater than reasonable and proper with regard to traffic conditions and the use of the highway, contrary to, and in violation of, the provisions of 625 ILCS 5/11-601(a) of the Illinois Revised Statutes;
 - c) Carelessly and negligently operated said motor vehicle without keeping a proper and sufficient lookout for other vehicles in and about the area, and specifically for the motor vehicle operated by the Plaintiff;
 - d) Carelessly and negligently followed the Plaintiff's motor vehicle more closely than was reasonable and prudent, without having due regard for the speed of the such vehicle and the traffic upon, and the condition of, the highway, contrary to, and in violation of, the provisions of 625 ILCS 5/11-710(a) of the Illinois Revised Statutes;
 - e) Carelessly and negligently failed to have said motor vehicle equipped with proper and sufficient brakes, contrary to, and in violation of, the provisions of 625 ILCS 5/12-301(a) of the Illinois Revised Statutes;
 - f) Carelessly and negligently failed to give audible and proper warning of the approach of said motor vehicle, although such warning was necessary to insure the safe operation of said vehicle contrary to, and in violation of, the provisions of 625 ILCS 5/12-601(a) of the Illinois Revised Statutes;
 - g) Carelessly and negligently failed to maintain proper control over said motor vehicle at all times;
 - h) Carelessly and negligently failed to stop said motor vehicle when danger was imminent so as to avoid striking the Plaintiff's vehicle;
 - i) Carelessly and negligently failed to change the course of said motor vehicle so as to avoid striking the Plaintiff's vehicle; and/or
 - j) Otherwise carelessly, negligently and improperly drove and operated said motor vehicle.
- 6) As a direct and proximate result of one or more of the aforesaid careless and negligent acts, the vehicle being operated by the Defendant, RONALD E. KNOWLES collided

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with the vehicle being operated by the Plaintiff, JAINTILAL MANNA and as a direct and proximate result of that collision the Plaintiff was then and there severely and seriously injured, both internally and externally, and he suffered a severe shock to his nervous system, and bruises, contusions and lacerations to his body, and became sick and disabled, and will continue to suffer great pain, discomfort and physical impairment; and his said injuries required hospitalization, all of which said injuries are permanent; and he has been kept from attending to his ordinary affairs and duties; and he has lost large gains, and has become obligated for large sums of money for medical and hospital care and attention.

WHEREFORE the Plaintiff, JAINTILAL MANNA, prays for judgment against the Defendants, RONALD E. KNOWLES, individually and as agent of, FOODLINER, INC. and FOODLINER, INC., individually, in an amount in excess of THIRTY THOUSAND DOLLARS (\$30,000.00) as will fairly, reasonably and adequately compensate him for his injuries and damages, together with his costs in bringing this suit.

COUNT II- NEGLIGENCE v. RONALD E. KNOWLES, individually and as agent of
MCCOY GROUP, INC. and MCCOY GROUP, INC.individually

1) On February 17, 2020, Interstate 94 was a public highway running in an easterly and westerly direction at or near the Mile Post 21.25, in the Township of Vernon, County of Lake and State of Illinois.

2) At the time and place aforesaid the Plaintiff, JAINTILAL MANNA, owned and/or operated a vehicle in an westerly direction on Interstate 94 at or near Mile Post 21.25, in the

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Township of Vernon, County of Lake and State of Illinois.

3) At the time and place aforesaid, the Defendant, RONALD E. KNOWLES, operated a motor vehicle in a westerly direction on Interstate 94 at or near Mile Post 21.25, in the City, County and State aforesaid, and that vehicle was owned, managed, maintained, supervised, and controlled by the Defendant, FOODLINER, INC.

4) At all relevant times herein, the Defendant, RONALD E. KNOWLES, operated said vehicle with the permission of the Defendant, MCCOY GROUP, INC.

5) At all relevant times herein, the Defendant, RONALD E. KNOWLES, was an agent and or employee of the Defendant, MCCOY GROUP, INC, and was driving said vehicle within the scope of his agency, employment, and or servitude.

6) At all times mentioned herein, the Defendant, MCCOY GROUP, INC. individually and by and through its duly authorized agent, RONALD E. KNOWLES and RONALD E. KNOWLES, individually, had the duty in the maintenance and operation of said vehicle to exercise ordinary care and caution to avoid injury to persons lawfully upon the thoroughfare, including the Plaintiffs.

7) At the time and place aforesaid, the Defendant, MCCOY GROUP, INC individually and by and through its duly authorized agent, RONALD E. KNOWLES and RONALD E. KNOWLES, individually, breached their aforementioned duty in one or more of the following ways:

- a) Carelessly and negligently operated, managed, maintained and controlled said vehicle;
- b) Carelessly and negligently operated said motor vehicle at rate of speed that was greater than reasonable and proper with regard to traffic conditions and the use of the highway, contrary to, and in violation of, he

provisions of 625 ILCS 5/11-601(a) of the Illinois Revised Statutes;

- c) Carelessly and negligently operated said motor vehicle without keeping a proper and sufficient lookout for other vehicles in and about the area, and specifically for the motor vehicle operated by the Plaintiff;
- d) Carelessly and negligently followed the Plaintiff's motor vehicle more closely than was reasonable and prudent, without having due regard for the speed of the such vehicle and the traffic upon, and the condition of, the highway, contrary to, and in violation of, the provisions of 625 ILCS 5/11-710(a) of the Illinois Revised Statutes;
- e) Carelessly and negligently failed to have said motor vehicle equipped with proper and sufficient brakes, contrary to, and in violation of, the provisions of 625 ILCS 5/12-301(a) of the Illinois Revised Statutes;
- f) Carelessly and negligently failed to give audible and proper warning of the approach of said motor vehicle, although such warning was necessary to insure the safe operation of said vehicle contrary to, and in violation of, the provisions of 625 ILCS 5/12-601(a) of the Illinois Revised Statutes;
- g) Carelessly and negligently failed to maintain proper control over said motor vehicle at all times;
- h) Carelessly and negligently failed to stop said motor vehicle when danger was imminent so as to avoid striking the Plaintiff's vehicle;
- i) Carelessly and negligently failed to change the course of said motor vehicle so as to avoid striking the Plaintiff's vehicle; and/or
- j) Otherwise carelessly, negligently and improperly drove and operated said motor vehicle.

6) As a direct and proximate result of one or more of the aforesaid careless and negligent acts, the vehicle being operated by the Defendant, RONALD E. KNOWLES individually and as agent employee and or servant of MCCOY GROUP, INC. collided with the vehicle being operated by the Plaintiff, JAINTILAL MANNA and as a direct and proximate result of that

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collision the Plaintiff was then and there severely and seriously injured, both internally and externally, and he suffered a severe shock to his nervous system, and bruises, contusions and lacerations to his body, and became sick and disabled, and will continue to suffer great pain, discomfort and physical impairment; and his said injuries required hospitalization, all of which said injuries are permanent; and he has been kept from attending to his ordinary affairs and duties; and he has lost large gains, and has become obligated for large sums of money for medical and hospital care and attention.

WHEREFORE the Plaintiff, JAINTILAL MANNA, prays for judgment against the Defendants, RONALD E. KNOWLES, individually and as agent of, MCCOY GROUP, INC. and MCCOY GROUP, INC., individually, in an amount in excess of THIRTY THOUSAND DOLLARS (\$30,000.00) as will fairly, reasonably and adequately compensate him for his injuries and damages, together with his costs in bringing this suit.



DANIEL E GOODMAN
ATTORNEY FOR PLAINTIFF

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ROSEMONT, IL 60018
(847) 292-6000
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2120 - Served 2121 - Served
 2220 - Not Served 2221 - Not Served
 2320 - Served By Mail 2321 - Served By Mail
 2420 - Served By Publication 2421 - Served By Publication
 Summons - Alias Summons

(06/28/18) CCG 0001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

JAINTILAL MANNA

2021L010348

(Name all parties)

Case No.

RONALD E. KNOWLES, individually and as agent of
 FOODLINER, INC, FOODLINER, INC. individually, et al.

☒ SUMMONS ☐ ALIAS SUMMONS

To each Defendant: Foodliner, Inc. c/o r/a LINDA BLISSE, 1932 S SPRING ST, SPRINGFIELD, IL 62704

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee within thirty (30) days after service of this Summons, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit www.cookcountyclerkofcourt.org to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

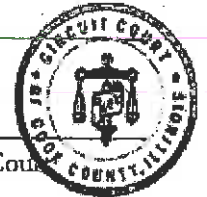
To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <https://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>.

Witness: _____

10/21/2021 2:11 PM IRIS Y. MARTINEZ



Atty. No.: 46715

DOROTHY BROWN, Clerk of Court

Atty Name: Daniel E Goodman/Law Offices of Daniel E Goodman, LLC

Atty. for: Plaintiff

Date of Service: _____

Address: 10400 W. Higgins Road, Suite 500

(To be inserted by officer on copy left with Defendant or other person):

City: Rosemont

State: IL

Zip: 60018

Telephone: 847/292-6000

Primary Email: dan@danielgoodmanlaw.com

Secondary Email: yuliya@danielgoodmanlaw.com

Tertiary Email: _____

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois cookcountyclerkofcourt.org

CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- FILED DATE: 10/21/2021 2:11 PM 2021L010348
- Richard J Daley Center
50 W Washington
Chicago, IL 60602
 - District 2 - Skokie
5600 Old Orchard Rd
Skokie, IL 60077
 - District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008
 - District 4 - Maywood
1500 Maybrook Ave
Maywood, IL 60153
 - District 5 - Bridgeview
10220 S 76th Ave
Bridgeview, IL 60455
 - District 6 - Markham
16501 S Kedzie Pkwy
Markham, IL 60428
 - Domestic Violence Court
555 W Harrison
Chicago, IL 60607
 - Juvenile Center Building
2245 W Ogden Ave, Rm 13
Chicago, IL 60602
 - Criminal Court Building
2650 S California Ave, Rm 526
Chicago, IL 60608
 - Domestic Relations Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - Civil Appeals
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - Criminal Department
Richard J Daley Center
50 W Washington, Rm 1006
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - County Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - Probate Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - ⊗ Law Division
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - Traffic Division
Richard J Daley Center
50 W Washington, Lower Level
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Daley Center Divisions/Departments**
- Civil Division
Richard J Daley Center
50 W Washington, Rm 601
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
 - Chancery Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

Hearing Date: No hearing scheduled
Courtroom Number: No hearing scheduled
Location: No hearing scheduled

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10/21/2021 2:11 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L010348

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

ATTORNEY NO. 46715

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

15299735

JAINTILAL MANNA

Plaintiff,

vs.

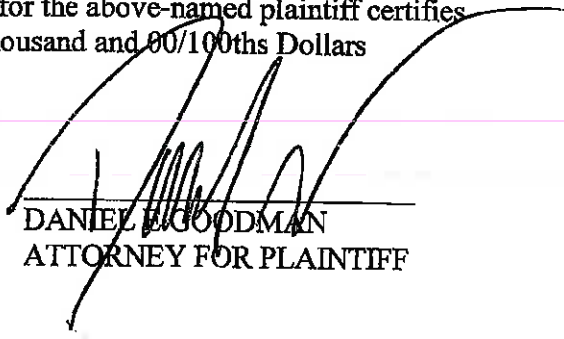
NO. 2021L010348

RONALD E. KNOWLES, individually and as
agent of FOODLINER, INC, FOODLINER, INC.
individually, RONALD E. KNOWLES individually
and as agent of MCCOY GROUP, INC., MCCOY
GROUP, INC., individually,

DEFENDANTS.

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222 (B)

Pursuant to Supreme Court Rule 222(B), Counsel for the above-named plaintiff certifies that plaintiff seeks money damages in excess of Thirty Thousand and 00/100ths Dollars (\$30,000.00).


DANIEL E. GOODMAN
ATTORNEY FOR PLAINTIFF

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